

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

		x
LUKE WILSON,		:
		:
	Plaintiff	:
-against-		:
		:
		:
		:
THE TOWN OF MOUNT JACKSON, CHIEF		:
OF POLICE JEFF STERNER, SERGEANT		:
KEITH COWART, and POLICE OFFICERS		:
CHRISTINA WHORTON, ROBERT YOUNG		:
and MARK JOHNSON of the MOUNT		:
JACKSON POLICE DEPARTMENT, and		:
TODD HOLTZMAN,		:
		:
	Defendants,	:
		x

No. 5:21-CV-00055-TTC

JOINT MOTION TO EXTEND EXPERT DESIGNATION DEADLINES

The parties jointly request this Court to modify the Court's December 15, 2021 Scheduling Order so as to extend the deadlines for the parties to designate expert witnesses. In support of his motion, the parties state as follows:

1. They have discussed the deadlines, and all agree that the current scheduled expert designations do not provide them sufficient time to conduct discovery and obtain experts. The parties have agreed to a proposed new expert witness deadline schedule, as follows:

- a. the deadline for Plaintiff to provide his Initial Expert Disclosures shall be
April 30, 2022
- b. the deadline for Defendants to provide their Initial Expert Disclosures shall be

June 30, 2022

c. the deadline for Plaintiff to provide any Rebuttal Expert Disclosures shall be

July 31, 2022.

2. The proposed new expert designation schedule shall not affect the Court's discovery schedule or otherwise impact the trial date in this matter.
3. Granting the proposed new expert witness designation schedule will promote the full administration of justice for all parties.

WHEREFORE, Plaintiff, Luke Wilson, together with the Defendants in this matter, request that this Court grant him the request for a new expert witness designation schedule as set forth above, and for such other relief as the Court deems appropriate.

Dated: January 10, 2022
Manassas, Virginia

/s/ Thomas R. Breeden
Thomas R. Breeden
One of Plaintiff's Attorneys

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Certificate of Service

I hereby certify that on January 10, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Thomas R. Breeden
Thomas R. Breeden